



April 25, 2023

**Via ECF and E-mail**

Hon. Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2103  
New York, NY 10007

**MEMO ENDORSED**

**Re: *In re Tether and Bitfinex Crypto Asset Litigation*, 19-CV-09236 (KPF)**

Dear Judge Failla:

We represent Plaintiffs in the above-referenced action. Last night, Plaintiffs filed a letter seeking a pre-motion conference on B/T Defendants' failure to fully comply with the Court's September 20, 2022 order to produce trading records in response to Plaintiffs' Revised Document Request Nos. 23-25 ("Plaintiffs' Letter Motion"). *See* ECF No. 328. Plaintiffs inadvertently filed an incomplete version of Exhibit 2 to that motion and respectfully request that the Court consider the attached Revised Exhibit 2 when considering Plaintiffs' Letter Motion.

Revised Exhibit 2 includes one additional page, which Plaintiffs have added to existing Exhibit 2, filed at ECF No. 328-2 (under-seal version). [REDACTED]

Plaintiffs respectfully request that the Court refer to Revised Exhibit 2 instead.

Respectfully submitted,

/s/ Andrew R. Dunlap

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*Interim Lead Counsel and Attorneys for  
Plaintiffs and the Proposed Class*

cc: All Counsel of Record (via ECF)

Application GRANTED. The Court appreciates Plaintiffs' submission of the corrected exhibit, and will consider it in resolving Plaintiffs' motion.

Dated: April 26, 2023  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE